

EXHIBIT 1



In the Matter Of:

Blozis

v.

Mellon Trust of Delaware, et al.

C.A. # 05-891 (SLR)

Transcript of:

Linda J. Blozis

Volume # 1

July 26, 2006

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Blozis
Linda J. Blozis, Volume 1

v.
C.A. # 05-891 (SLR)

Mellon Trust of Delaware, et al.
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VOLUME ONE

IN THE UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF DELAWARE

LINDA J. BLOZIS,)
)
 Plaintiff,)
) Civil Action
 v.) No. 05-891 (SLR)
)
 MELLON TRUST OF DELAWARE,)
 NATIONAL ASSOCIATION; MELLON)
 BANK, NATIONAL ASSOCIATION;)
 MELLON FINANCIAL CORPORATION,)
)
 Defendants.)

Deposition of LINDA J. BLOZIS taken
pursuant to notice at the Law Office of John M.
LaRosa, Two East 7th Street, Suite 302, Wilmington,
Delaware, beginning at 10:05 a.m., on Wednesday,
July 26, 2006, before Kurt A. Fetzer, Registered
Diplomate Reporter and Notary Public.
APPEARANCES:

JOHN M. LaROSA, ESQ.
LAW OFFICE OF JOHN M. LaROSA
Two East 7th Street - Suite 302
Wilmington, Delaware 19801
For the Plaintiff

STEPHANIE WILSON, ESQ.
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Princeton Forrestal Village
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1 LINDA J. BLOZIS,
2 the deponent herein, having first been
3 duly sworn on oath, was examined and
4 testified as follows:
5 EXAMINATION
6 BY MS. WILSON:
7 Q. Good morning, Ms. Blozis. My name is Stephanie
8 Wilson. I'm with the law firm of Reed Smith and we
9 have been retained by Mellon to represent it in the
10 lawsuit that you brought against it.
11 There are other attorneys that are also
12 working with me on this matter, but for now it's just
13 me.
14 Today we will be taking your deposition
15 which is a question and answer process and I'll be
16 asking you questions about allegations that you have
17 made in your complaint. And you have just been sworn
18 in, so your answers are under oath and although we're
19 in an informal setting in Mr. LaRosa's office, it
20 still has the same force and effect as if we were in a
21 more formal court setting.
22 If at any point you don't understand a
23 question that I'm asking of you, please let me know
24 and I will try to make the question clear so that you

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1 understand what I am asking you.
2 If you don't hear what I am asking you,
3 please say so and I will speak up.
4 If you don't say, "I don't understand the
5 question" or "I didn't hear the question" and you go
6 ahead and try to answer it, I will assume that you
7 have understood it and you heard it and that you're
8 answering accordingly.
9 If at any point in time you need to take a
10 break, please let me know. You can take a break.
11 If at any point Mr. LaRosa makes an
12 objection to a question I'm asking you, please don't
13 answer until Mr. LaRosa and I have worked out the
14 objection if we can and then he will direct you on how
15 to proceed with respect to that question.
16 Any questions of me so far?
17 A. No.
18 Q. Okay. Ms. Blozis, what is your date of birth?
19 A. December 10th, 1945.
20 Q. And, Ms. Blozis, have you ever had your
21 deposition taken before, what we're doing now?
22 A. Do you mean in this case?
23 Q. No. At any point in time?
24 A. No.

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1 Q. And have you ever been a plaintiff before in a
2 lawsuit other than this one, by "plaintiff" bringing
3 an action?
4 A. No.
5 Q. Now, looking at your discovery information that
6 you produced to us, I saw that around I believe it was
7 1990 you were involved in a divorce proceeding?
8 A. Yes.
9 Q. Is that correct?
10 A. Yes.
11 Q. Were you the one petitioning the Court for it?
12 A. Yes.
13 Q. Did you have your deposition taken in
14 connection with that?
15 A. No.
16 Q. Was that the only time that you were married?
17 A. Yes.
18 Q. And you're single right now?
19 A. Yes.
20 Q. Ms. Blozis, other than your attorney, have you
21 spoken to anyone about your deposition today?
22 A. I don't understand what you mean by "anyone."
23 Q. Anyone being -- again, one of the caveats is
24 that you can't discuss conversations that you have

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1 spoken with your attorney about any issues.
2 But did you speak, for example, with any
3 Mellon employees, former or present Mellon employees
4 about your deposition?
5 A. No.
6 Q. That's what I meant by have you spoken to
7 anyone about your deposition.
8 Did you mention to anybody I have a
9 deposition coming up, I'm going to be going into
10 Delaware on such-and-such date?
11 A. And by "anybody" you mean?
12 Q. Anybody, other than your attorney.
13 A. My family.
14 Q. Okay. Other than family members?
15 A. One friend.
16 Q. Okay. Family members and friends?
17 A. One friend.
18 Q. Okay. But no one that either was employed by
19 Mellon at some point or presently employed by Mellon?
20 A. No.
21 MS. WILSON: Can you could mark this as
22 Blozis 1, please?
23 (Blozis Deposition Exhibit No. 1 was
24 marked for identification.)

2 (Pages 2 to 5)

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1 BY MS. WILSON:
2 Q. Ms. Blozis, I show you what's been marked as
3 Blozis 1 for identification. Have you seen that
4 document before? Take some time to look through it.
5 MR. LaROSA: Go ahead and flip through the
6 whole document.
7 **A. (Reviewing document) Please repeat the**
8 **question.**
9 MS. WILSON: Could you repeat the
10 question, please?
11 (The reporter read back the last
12 question.)
13 THE WITNESS: Yes.
14 BY MS. WILSON:
15 Q. And you have seen it before today?
16 **A. Yes.**
17 Q. And did you have an opportunity to review it
18 prior to today?
19 **A. Yes.**
20 Q. And are the allegations set forth in Blozis 1
21 true and accurate?
22 **A. Yes.**
23 Q. I'm going to be asking you about some of the
24 allegations in a few moments, but before we get into

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1 that I wanted to talk a bit about your employment with
2 Mellon.
3 You were first employed around the --
4 well, I guess you tell me. When did you start your
5 employment?
6 **A. February 1990.**
7 Q. And which Mellon entity were you employed by?
8 **A. At that time Mellon Bank Delaware, N.A.**
9 Q. And what was the physical location when you
10 started in 1990?
11 **A. The building located at 10th and Market**
12 **Streets.**
13 Q. Now, is that a different address from
14 Greenville Crossing?
15 **A. Yes.**
16 Q. It's different. Okay. When you started in
17 1990 what was your title?
18 **A. At this time I recollect it was trust**
19 **secretary.**
20 Q. And I take it that you assisted someone or you
21 were the assistant to someone as trust secretary?
22 **A. Yes.**
23 Q. And who was that?
24 **A. I don't recall his name at this time.**

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1 Q. That's fine.
2 Now, at some point in time your title
3 changed?
4 **A. Yes.**
5 Q. And what was the next position that you held?
6 **A. To the best of my recollection, it changed from**
7 **trust secretary to trust assistant.**
8 Q. Is that the same thing as senior trust
9 specialist?
10 **A. The responsibilities evolved to that and the**
11 **company changed the title.**
12 Q. And when -- and we will use your title for
13 purposes of this question when you say that your next
14 title after trust secretary was trust assistant.
15 Do you remember when that occurred?
16 **A. To the best of my recollection, I believe**
17 **approximately 1994 and '95.**
18 Q. Were you reporting to the same gentleman that
19 you were reporting to as trust secretary?
20 **A. No.**
21 Q. A different person?
22 **A. Yes.**
23 Q. Do you remember who it was?
24 **A. Linda M. Squier.**

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1 Q. Were you still at the 10th and Market address
2 at that point?
3 **A. Yes.**
4 Q. At what point did you change locations from
5 10th and Market?
6 **A. To the best of my memory, we moved to**
7 **Greenville in 2001 or 2002.**
8 Q. All right. And do you know why you moved?
9 **A. I don't quite understand your question.**
10 Q. Do you know what precipitated the move from the
11 10th and Market location to the Greenville location?
12 **A. To the best of my knowledge, the company wanted**
13 **to place the private trust management offices closer**
14 **to a private banking location there.**
15 Q. And what was the private banking location?
16 **A. The private bank was located on the first floor**
17 **of Two Greenville Crossing.**
18 Q. And you were located on another floor?
19 **A. Yes.**
20 Q. Now, with respect to the trust assistant
21 position that you held around the '95 time frame, was
22 there another position that you held after that?
23 **A. I don't understand quite what you mean.**
24 Q. Well, you didn't hold the trust assistant

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1 position throughout the term of your employment,
2 correct?
3 **A. Are you referring to the title of the position?**
4 Q. Yes.
5 **A. The title changed.**
6 Q. All right. And what was the next title change?
7 **A. To the best of my recollection, it evolved to**
8 **trust specialist.**
9 Q. At some point did your title change to
10 portfolio administrator?
11 **A. Yes, it did.**
12 Q. Is that different from trust specialist?
13 **A. It's different words but basically the same**
14 **responsibilities.**
15 Q. And do you remember when your title became
16 trust specialist?
17 **A. To the best of my recollection, 1997 or '98.**
18 Q. And as a trust specialist were you still
19 reporting to Linda Squier?
20 **A. To the best of my recollection.**
21 Q. And at some point you say -- let me just back
22 up.
23 With respect to your duties as a trust
24 specialist, can you describe what they were?

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1 **A. As a trust specialist?**
2 Q. Yes.
3 **A. It was to assist the trust officers and**
4 **investment officers.**
5 Q. And I believe you testified, Ms. Blozis, that
6 at the time that you were trust specialist you were
7 reporting to Linda Squier.
8 Were there any other individuals you were
9 reporting to?
10 **A. To the best of my recollection, at that time**
11 **Mellon went to a more team concept.**
12 Q. And does that mean there were people on a
13 particular team that you reported to or did
14 assignments for?
15 **A. Yes.**
16 Q. And did it have a name, the particular team?
17 **A. Yes.**
18 Q. And what was the team name?
19 **A. It was the Delaware team under Brendan Gilmore.**
20 Q. And that was according to my notes you believe
21 you started or your title changed to trust specialist
22 around the '97-98 time frame?
23 **A. To the best of my recollection at this time.**
24 Q. Is that when the team concept came into play?

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1 **A. As best as I can remember, about the mid to,**
2 **midnineties to that time.**
3 Q. And that team was headed up by Brendan Gilmore,
4 the Delaware team?
5 **A. Yes.**
6 Q. Now, with respect to your duties, you were in
7 private banking?
8 **A. No.**
9 Q. What was the name, what was the name of the
10 team?
11 **A. As best as I recall at that time Mellon started**
12 **to call the trust teams private asset management**
13 **teams.**
14 Q. Now, I want to get a sense of the Delaware team
15 and it appears based on your time frame that you were
16 still at the 10th and Market location around that time
17 that it went to the team concept.
18 Does that sound accurate?
19 **A. That's your question?**
20 Q. Yes.
21 **A. Yes.**
22 Q. I want to get a sense of who consisted of the
23 Delaware team. You obviously?
24 **A. (The witness nodded.)**

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1 Q. Who else was on the team?
2 **A. At that time?**
3 Q. Yes.
4 **A. Bob, Robert H. Bell was the senior trust**
5 **officer. Linda Squier was a trust officer. Kathleen**
6 **Agne was an assistant and I was an assistant.**
7 Q. And at the top would have been Brendan?
8 **A. Top of?**
9 Q. The top of, sort of the top of the team?
10 **A. Those people reported to Brendan Gilmore.**
11 Q. Do you know who Brendan Gilmore reported to
12 around the '97-98 time frame?
13 **A. It would have been the senior regional officer**
14 **in Philadelphia.**
15 Q. Do you know who that was?
16 **A. At this time I don't recall the name.**
17 Q. Was Brendan Gilmore's office at the 10th and
18 Market location?
19 **A. No.**
20 Q. Do you know where his office was?
21 **A. At the Mellon building, office building in**
22 **Philadelphia on Market Street.**
23 Q. You said, Ms. Blozis, that at some point in
24 time your title changed to portfolio administrator.

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1 Do you remember when that was?
2 **A. To the best of my recollection, that changed in**
3 **the late nineties, '98 to '99.**
4 Q. I believe you also testified that while your
5 title changed, your responsibilities didn't change
6 from that of trust specialist.
7 **A. When are you referring to testifying?**
8 Q. Around -- let's see. If you became portfolio
9 administrator around the late nineties and you believe
10 that you held the position of trust specialist around
11 the '97-98 time frame, I wanted to get a sense of
12 whether the portfolio administrator position carried
13 with it different responsibilities than the trust
14 specialist position.
15 **A. It did.**
16 Q. It did. Okay. And what was the difference?
17 **A. The portfolio administrator in addition to**
18 **being a trust assistant also assisted the investment**
19 **officer at that time.**
20 Q. Now, with respect to the portfolio
21 administrator position, you held that position until
22 the time you left Mellon. Is that correct?
23 **A. I believe, to the best of my recollection, yes.**
24 **That was -- yes.**

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1 Q. And you left Mellon in 2003?
2 **A. Yes.**
3 Q. Now, when you became a portfolio administrator
4 was that considered a promotion from trust specialist?
5 **A. I don't understand what you mean by a**
6 **promotion.**
7 Q. Well, was there an upgrade in I think it was
8 grades? Did you go from one grade to a higher grade?
9 **A. To the best of my recollection, yes.**
10 Q. Do you remember how it came about that you
11 became a portfolio administrator?
12 **A. I don't understand what you mean.**
13 Q. Did you have to apply for the position? Did
14 someone ask you if you would like to become a
15 portfolio administrator?
16 **A. You asked two questions there.**
17 Q. You said you didn't understand my question, so
18 I was trying to give you some examples of how to think
19 about the question. When I ask you how did it come
20 about, sometimes how it comes about is somebody asks
21 you if you want the position. Sometimes it comes
22 about you hear about it and you go to someone and say
23 I would like to have it.
24 When I am asking how it came about, those

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1 are some examples that might help you with the
2 question.
3 **A. To the best of my memory, Mellon changed their**
4 **structuring, their job titles and the structuring.**
5 Q. And as a result your job title changed?
6 **A. Yes.**
7 Q. With respect to the trust specialist position,
8 you identified a number of people that was on I guess
9 the private asset management team for Delaware and
10 those were Robert Bell, Linda Squier, Kathleen Agne
11 and yourself?
12 **A. Is that your question?**
13 Q. Yes.
14 **A. Yes.**
15 Q. And when you became portfolio administrator
16 around the 1999 time frame, was that still the team?
17 **A. Not the complete team.**
18 Q. In 1999 who consisted of the team?
19 **A. Martha Feters was on that team, Mr. Bell,**
20 **Linda Squier, Kathleen, myself and there were members**
21 **in the Philadelphia office.**
22 Q. When you say, "members in the Philadelphia
23 office," do you know who they were?
24 **A. As I remember at this time, Kristy Hunt, Cindy**

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1 **Chambliss, Marion -- I don't remember Marion's last**
2 **name at this time. And I don't recall who else at**
3 **that time.**
4 Q. Martha Feters, what was her title around the
5 1999 time frame?
6 **A. To the best of my recollection, Martha was an**
7 **investment officer.**
8 Q. Kristy Hunt, do you remember what her title was
9 around the 1999 time frame?
10 **A. As I recall, she was an investment officer.**
11 Q. And Cindy Chambliss?
12 **A. Was assistant to Brendan Gilmore.**
13 Q. And Marion?
14 **A. Was a portfolio administrator.**
15 Q. Now, you held the position of portfolio
16 administrator from approximately 1999 to 2003, so I
17 would take it that during that time the composition of
18 the groups changed, people leaving, people coming in.
19 Is that fair to say?
20 **A. Yes.**
21 Q. Over a four-year period.
22 Turning to just the period of time that
23 you held the title of portfolio administrator, did you
24 report -- my question is broad. It's from 1999 to

5 (Pages 14 to 17)

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1 2003.
2 Did you always report to Brendan Gilmore?
3 **A. He was the team leader.**
4 Q. And did you have a direct reporting
5 relationship with him?
6 **A. No.**
7 Q. Now, just drawing your attention to the period
8 of time that you held the portfolio administrator
9 position, who did you report to? If you want to start
10 by 1999.
11 **A. Linda Squier, Martha Feters, William Becker**
12 **and Greg Landis, to the best of my recollection.**
13 Q. In 1999 what was William Becker's title?
14 **A. As I remember, he was a vice president and an**
15 **investment officer.**
16 Q. And Greg Landis?
17 **A. Vice president - trust officer.**
18 Q. Now, and these were the four individuals that
19 you had direct reporting obligations to, Linda,
20 Martha, William and Greg, in 1999?
21 **A. Not all at the same time.**
22 Q. When you say, "Not all at the same time," what
23 do you mean?
24 **A. You said in 1999?**

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1 Q. Yes.
2 **A. To the best of my recollection, the reporting**
3 **went from Martha Feters to William Becker.**
4 Q. Okay. In 1999?
5 **A. To the best of my memory.**
6 Q. That's fine. It's only to the best that you
7 can remember. It's good that you're saying to the
8 best of your memory that that's what occurred.
9 So in 1999 to the best of your
10 recollection you were initially reporting to Martha
11 Feters and then at some point in 1999 you began
12 reporting to William Becker?
13 **A. To the best of my memory about the year, yes.**
14 Q. Now, would it be fair to say that Martha would
15 give you assignments to do when you were reporting to
16 her? Did she, for example, say Linda, can you do Z, Y
17 and Z? Is that how it worked?
18 **A. Yes.**
19 Q. And then after you started reporting to
20 William, he was the one who would give you
21 assignments?
22 **A. William Becker?**
23 Q. Yes.
24 **A. Yes.**

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1 Q. And would he give you assignments for the
2 entire group or assignments for him? By that I mean
3 did he have a set group of clients that he worked for
4 and you, in turn, worked for those clients or were you
5 doing work for the entire group?
6 **A. Predominantly I reported to Mr. Becker and the**
7 **portfolio of clients that we were responsible for**
8 **and...**
9 Q. And how long did you report to William Becker?
10 **A. To the best of my memory, for as long as**
11 **William Becker was the senior officer in Delaware**
12 **until he transferred to Philadelphia.**
13 Q. Do you remember when he transferred?
14 **A. As best I remember, Mr. Becker left the**
15 **Delaware offices and did work in Philadelphia about**
16 **between 2001 and 2002.**
17 Q. When William Becker transferred to the
18 Philadelphia office, is that the point in time that
19 you started reporting to Greg Landis?
20 **A. Reporting? How do you mean "reporting"?**
21 Q. Reporting in the same sense of what you were
22 doing with William Becker, taking on or working with
23 his portfolio of clients.
24 **A. Not exclusively to Greg Landis.**

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1 Q. And who were the other people?
2 **A. While Mr. Becker was in Philadelphia, there was**
3 **still reporting to him and jointly with Greg Landis**
4 **and supporting the team.**
5 Q. And that was around approximately the 2001-2002
6 time frame?
7 **A. What was approximately?**
8 Q. That your reporting was to Greg Landis, William
9 Becker and to the team?
10 **A. To the best of my memory, yes.**
11 Q. Around 2001-2002 who -- when you say the team,
12 who consisted of the team?
13 **A. The team meaning?**
14 Q. Your term the team.
15 **A. The team, the Delaware team. It was headed by**
16 **Brendan Gilmore. Cindy, Cindy Chambliss was his**
17 **assistant. As best I recall, William Becker was still**
18 **an investment officer. Marion, her last name I don't**
19 **recall.**
20 Q. She was still in Philly?
21 **A. Marion was in Philadelphia. Bruce Holmquist**
22 **was the investment officer in the D.C. area as part of**
23 **the Delaware team. Until her release, Kathleen Agne**
24 **was part of the team. I was part of the team. And at**

6 (Pages 18 to 21)

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1 **some point Maria Dunlop became part of the team.**
2 Q. Now, around the 2001-2002 time frame you just
3 described what you recall as being the Delaware team.
4 Were there other portfolio managers part
5 of the Delaware team during 2001-2002 other than
6 yourself? For example, like I believe you had
7 testified at some point that Kathleen Agne was a
8 portfolio administrator.
9 **A. Administrator.**
10 Q. Did I say manager?
11 **A. Yes.**
12 Q. I meant administrator. Agne was a portfolio
13 administrator. Anybody else?
14 **A. Myself, Marion and, as I recall, as I**
15 **recollect, Dan Merlino in Philadelphia.**
16 Q. You recall him to be around 2001-2002 in the
17 Philadelphia office?
18 **A. As best as I remember, yes.**
19 Q. And he was a portfolio administrator, Dan
20 Merlino?
21 **A. To the best of my recollection, yes.**
22 Q. And Maria Dunlop, was she a portfolio
23 administrator?
24 **A. When she was hired.**

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1 Q. She came in as a portfolio administrator?
2 **A. Yes.**
3 Q. Now, at some point Kathleen Agne was no longer
4 working at Mellon. Is that right?
5 **A. Yes.**
6 Q. Do you remember when that was?
7 **A. To the best of my memory, March of 2002.**
8 Q. Do you remember when Maria Dunlop was hired?
9 **A. To the best of my memory, July 2002.**
10 Q. Was Maria hired as a result of Kathleen's
11 departure?
12 **A. I don't understand your question.**
13 Q. I gather when Kathleen left you were down one
14 portfolio administrator. It was just you in the
15 Delaware office?
16 **A. Yes.**
17 Q. And was Maria hired to bring you back up to the
18 complement of I guess two portfolio administrators in
19 the Delaware office?
20 **A. I believe that was -- I'm not sure.**
21 Q. Did you ever at any point in time work
22 physically in the Philadelphia office?
23 **A. Work physically how do you mean?**
24 Q. Go to the office on a meeting or work related.

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1 MR. LaROSA: You're not asking her about
2 physical work? You're asking her where she was
3 physically located?
4 MS. WILSON: Yes.
5 BY MS. WILSON:
6 Q. You went to the Philadelphia office, had an
7 office or conference area or meetings?
8 **A. No. Only for meetings.**
9 Q. Ms. Blozis, at the time that you left in 2003
10 did the Delaware team still consist of Brendan
11 Gilmore, Cindy Chambliss, William Becker, Marion,
12 Bruce Holmquist, Maria Dunlop, Dan Merlino?
13 **A. No.**
14 Q. How had it changed?
15 **A. How do you mean how had it changed?**
16 Q. When you said that it didn't have that same
17 composition, I assume that someone either left or
18 someone came in?
19 **A. It changed.**
20 Q. When I said how did it change, did someone
21 leave the team or someone came into the team?
22 **A. To the best of my recollection, at the time**
23 **William Becker became a team leader at another team.**
24 Q. Do you remember what team that he went to?

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1 **A. To the best of my memory, he headed up his own**
2 **team in Philadelphia.**
3 Q. And Greg Landis, he was a part of the team
4 around the 2002 time frame?
5 **A. Which team?**
6 Q. The Delaware team.
7 **A. Yes.**
8 Q. Ms. Blozis, at the time that you left Mellon --
9 and I have it here as being around July 19 of '03,
10 Does that sound right to you?
11 **A. Yes.**
12 Q. You were making 39,800 in terms of salary?
13 **A. Yes.**
14 Q. And at the time that you left were you covered
15 by a health plan?
16 **A. At the time that I left?**
17 Q. Right. Were you on any health plan, by that I
18 mean medical, dental, vision?
19 **A. When I worked for Mellon I was under the health**
20 **plan they offered.**
21 Q. And did that include vision, dental?
22 **A. They offered that at that time.**
23 Q. And that's what you took?
24 **A. I had medical, dental and at this time I don't**

7 (Pages 22 to 25)

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1 **recall if I took advantage of the vision.**
2 Q. Was there a co-pay? I'm thinking if we could
3 just hone in around the 2003 time frame.
4 **A. Co-pay for?**
5 Q. For your health. For example, did you have to
6 pay 20 percent and they paid 80?
7 **A. Yes.**
8 Q. Was it 20/80?
9 **A. To the best of my memory now, yes.**
10 Q. And did they have a 401(k) plan?
11 **A. In 2003?**
12 Q. Yes.
13 **A. Yes.**
14 Q. Were you a participant?
15 **A. Yes.**
16 Q. Do you remember what your level of contribution
17 was in 2003?
18 **A. To the best of my memory now, I contributed**
19 **between 2 and 5 percent.**
20 Q. And was there a match that the company made?
21 **A. As I recall, yes.**
22 Q. Do you remember what it was?
23 **A. Not at this time.**
24 Q. When you left Mellon around the July '03 time

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1 frame, did you roll over your 401(k) into another
2 plan?
3 **A. No.**
4 Q. Did you cash out your account?
5 **A. No.**
6 Q. It's still sitting with Mellon?
7 **A. Yes.**
8 Q. Do you remember how much you have in there?
9 **A. Yes.**
10 Q. How much?
11 **A. I don't understand your question about the**
12 **amount of it at this time.**
13 Q. As of 2003 usually you get statements of how
14 much you have in your account, your 401(k) account,
15 and my question was: When you left do you remember
16 how much you had in your account, your 401(k) account?
17 **A. To the best of my memory at this time and the**
18 **conditions of the market at that time, approximately**
19 **twenty-six or \$27,000.**
20 Q. Ms. Blozis, did Mr. Robert Bell ever supervise
21 you?
22 **A. I don't understand what you mean by**
23 **"supervise."**
24 Q. Well, did he ever give you work assignments?

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1 **A. To the best of my memory in his capacity as**
2 **senior trust officer situated at Delaware, yes,**
3 **occasionally.**
4 Q. Did he ever complete any performance
5 evaluations of you?
6 **A. Yes.**
7 Q. Do you remember when he completed performance
8 evaluations of you?
9 **A. As I recall, at periodic intervals in my**
10 **history with Mellon from 1990.**
11 Q. When you say, "from 1990," was there a period
12 in the 1990's?
13 **A. A period?**
14 Q. When you say from the 1990's, are you saying
15 from the 1990's through the time that you left in 2003
16 or was it sometime in the 1990's?
17 **A. While Mr. Becker was senior officer situated in**
18 **Delaware, he conducted the reviews of those team**
19 **members there.**
20 Q. When you said that Mr. Bell had also --
21 **A. I'm sorry. Did I say Bell or Becker?**
22 Q. You said Becker.
23 **A. I meant to say Robert Bell.**
24 Q. Okay.

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1 MS. WILSON: Could you back up, please,
2 with that when Ms. Blozis was answering the question
3 about Becker, please?
4 (The reporter read back as follows:
5 "Answer: While Mr. Becker was senior officer
6 situated in Delaware, he conducted the reviews
7 of those team members there.")
8 BY MS. WILSON:
9 Q. Did you mean with respect to that answer
10 Mr. Bell?
11 **A. Yes, I did.**
12 Q. And with respect to Mr. Bell was there ever a
13 point where he filled out a paper review of you?
14 **A. Yes.**
15 Q. And do you remember the periods of time that he
16 filled out a paper review?
17 **A. Reviews were scheduled yearly. They were not**
18 **always done yearly.**
19 Q. Do you remember the years that Mr. Bell filled
20 out a paper review of you?
21 **A. Not exactly at this time.**
22 Q. At some point in time Mr. Bell left the
23 company?
24 **A. Yes.**

8 (Pages 26 to 29)

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1 Q. Do you remember when that was?
2 **A. To the best of my memory, Mr. Bell was**
3 **transferred from Delaware to Philadelphia on the**
4 **Delaware team. And to the best of my memory, he left**
5 **Mellon in the early two hundreds -- 2000's.**
6 Q. 2000's. You said he was transferred from
7 Delaware to Philadelphia at some point, Mr. Bell?
8 **A. Yes.**
9 Q. Do you remember when he was transferred?
10 **A. To the best of my memory, the late 1990's.**
11 Q. Do you know why he was transferred?
12 **A. No.**
13 Q. But after the transfer he remained a part of
14 the Delaware team, although he was in the Philadelphia
15 office?
16 **A. Mr. Bell?**
17 Q. Mr. Bell.
18 **A. Yes.**
19 Q. Do you know why Mr. Bell left the company?
20 **A. To the best of my memory, he was forced to**
21 **resign.**
22 Q. And who forced him to resign?
23 **A. To the best of my memory, Brendan Gilmore.**
24 Q. And how do you know that Brendan Gilmore forced

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1 Mr. Bell to resign?
2 **A. Brendan Gilmore was the Delaware team leader.**
3 Q. So are you making the assumption that because
4 Brendan was the Delaware team leader that he had had
5 something to do with Mr. Bell resigning?
6 **A. Please repeat the question.**
7 MS. WILSON: Can you repeat the question,
8 please?
9 (The reporter read back the last
10 question.)
11 THE WITNESS: It's not an assumption.
12 BY MS. WILSON:
13 Q. When you say it's not an assumption, how do you
14 know?
15 **A. Members of the team understood pressures**
16 **Brendan Gilmore placed on Robert Bell.**
17 Q. Now, did Mr. Bell ever tell you that
18 Mr. Gilmore had forced him to resign?
19 **A. I don't understand your question.**
20 Q. Well, did you have any conversations with
21 Mr. Bell in which he said, "Mr. Gilmore forced me to
22 resign"?
23 **A. To the best of my memory, Mr. Bell did not use**
24 **your exact words.**

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1 Q. Okay. What did he say?
2 **A. To the best of my recollection, Mr. Bell felt**
3 **the workload was becoming unbearable.**
4 Q. And those were the discussions that you and
5 Mr. Bell were having?
6 **A. I don't understand what you mean by**
7 **"discussions."**
8 Q. Well, you said that he didn't use those exact
9 words and I believe I had said that Mr. Gilmore had
10 forced him to resign and then you were saying that
11 Mr. Bell felt that the workload was becoming I think
12 unbearable.
13 My question was: Did Mr. Bell tell you
14 this?
15 **A. To the best of my memory, he did not say that**
16 **directly. I don't recall his exact words.**
17 Q. You don't recall it, but you do recall having
18 some conversations with Mr. Bell concerning his
19 workload?
20 **A. Not specifically at this time.**
21 Q. Do you remember having any discussions with
22 Mr. Bell about why Mr. Bell was resigning?
23 **A. Not specifically at this time.**
24 Q. When you say, "Not specifically at this time"

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1 what do you mean by that?
2 **A. At this time I don't recall exact dates of**
3 **conversations regarding his resignation.**
4 Q. Okay. You don't have to give me exact dates.
5 The substance.
6 **A. Substantively Mr. Bell had worked for Mellon a**
7 **number of years, had been a senior officer, trust**
8 **officer for Mellon in Delaware from the time of my**
9 **initiation of employment until his transfer into**
10 **Philadelphia and at the time of his resignation.**
11 Q. And those are the substance of conversations
12 that you had with Mr. Bell?
13 **A. What was?**
14 Q. What you just described.
15 **A. I described his, I described his title and**
16 **position from when I first was employed until the time**
17 **he left and to the best of my recollection Mr. Bell's**
18 **employment, Mr. Bell's employment evolved to pressures**
19 **put on him to resign.**
20 Q. Now, Ms. Blozis, did you ever have any
21 conversations with Mr. Bell in which he talked about
22 pressures to resign?
23 **A. Not firsthandly that I recall at this time.**
24 Q. And was it Mr. Gilmore who was putting these

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1 pressures on Mr. Bell?
2 **A. To the best of my knowledge at this time, yes.**
3 Q. And why do you say it was Mr. Gilmore, to the
4 best of your knowledge?
5 **A. Mr. Gilmore's reputation as a team leader**
6 **demonstrated that.**
7 Q. What do you mean by that?
8 **A. What do I mean by?**
9 Q. When you say his reputation as a team leader
10 demonstrated that.
11 **A. Mr. Gilmore was an extremely difficult**
12 **personality to work for.**
13 Q. Is that what members of his team said about
14 him?
15 **A. What members?**
16 Q. When you say that, and I'm just paraphrasing my
17 notes of what you said, that Mr. Gilmore's reputation
18 as a team leader demonstrated, and I'm paraphrasing
19 now, that he was difficult to work for, so my
20 assumption was that people on his team were talking
21 and saying he's difficult. Am I wrong? I mean,
22 that's what I was gathering from your answer.
23 **A. Yes.**
24 Q. That was right, that people on the team were

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1 saying he's difficult to work for?
2 **A. Yes.**
3 Q. Okay. And who were the people who were saying
4 that he was difficult to work for?
5 **A. To the best of my recollection, William Becker,**
6 **Greg Landis at any time they were team members,**
7 **Marion, Linda Squier, Martha Feters, Scott Gilliland,**
8 **Ray Masucci, Bruce Holmquist.**
9 Q. You mentioned a couple of names that I didn't
10 have before. Ray Masucci?
11 **A. As I recall, Ray Masucci was an investment**
12 **officer on our team at some point in time in**
13 **Philadelphia.**
14 Q. Now, did Mr. Bell ever tell you that he felt
15 that he was being forced to resign because of his age?
16 **A. Not directly.**
17 Q. When you say, "Not directly," what do you mean?
18 In terms of having a conversation and having said,
19 "Linda, I feel like I'm being pressured because of my
20 age"?
21 **A. Mr. Bell was a man of great integrity. He**
22 **would never have made that comment directly to an**
23 **employee at my level.**
24 Q. Did you feel that Mr. Bell was being forced to

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1 resign because of his age?
2 **A. To the best of my recollection, yes.**
3 Q. Why did you believe that?
4 **A. I believe Brendan Gilmore wanted to eliminate**
5 **older members of the team and replace them with**
6 **younger people.**
7 Q. Now, do you know Brendan Gilmore's age?
8 **A. To the best of my memory -- do you mean at this**
9 **time?**
10 Q. Yes.
11 **A. To the best of my memory, Brendan Gilmore would**
12 **be between 55 and 58.**
13 Q. Now, Ms. Blozis, you said that you feel that
14 Brendan Gilmore wanted to eliminate older workers of
15 the team and replace them with younger ones?
16 **A. Yes.**
17 Q. And that was in response to the question why do
18 you think that Mr. Bell's forced resignation was as a
19 result of age? Why do you say that Gilmore wanted to
20 eliminate the older workers of the team and replace
21 them with younger ones?
22 **A. I don't understand the question.**
23 Q. What do you base that on when you make the
24 statement that Gilmore wanted to eliminate older

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1 workers of the team and replace them with younger
2 ones?
3 **A. I don't know why Brendan Gilmore wanted to**
4 **replace older members. I know that he replaced**
5 **Mr. Bell.**
6 **Correction: He put pressure on Mr. Bell**
7 **to resign. He put pressure on Linda Squier to resign.**
8 **He put pressure on Martha Feters to resign.**
9 Q. When you say that Gilmore put pressure on Bell
10 to resign, how do you know that?
11 **A. I know that from conversations with other**
12 **members of the team.**
13 Q. And who were those conversations with?
14 **A. Martha Feters, Linda Squier.**
15 Q. And what did Martha Feters tell you?
16 **A. At this time I cannot quote exactly.**
17 Q. You don't have to give me the exact.
18 Abbreviated or whatever you can recall.
19 **A. To the best of my recollection, Martha**
20 **indicated that Brendan Gilmore was overwhelming Robert**
21 **Bell with work that was unrealistic for any team**
22 **officer to do at that time.**
23 Q. And those were the gist of the conversations
24 that you were having with Martha Feters about

10 (Pages 34 to 37)

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1 Mr. Bell?
2 **A. Repeat that question, please.**
3 Q. You were giving me I guess an overall summary
4 of the conversations that you were having with Martha
5 Feters concerning Mr. Bell and why Martha felt that
6 Gilmore was trying to force Mr. Bell to resign and she
7 was saying that Gilmore was giving Bell an
8 overwhelming amount of work to do that was
9 unrealistic.
10 **A. That was not the predominance of my**
11 **conversations with Martha Feters regarding Bob Bell's**
12 **work.**
13 Q. What was the predominance?
14 **A. The predominance would include team work, team**
15 **responsibilities and would occasionally go towards the**
16 **fact of Mr. Bell's workload.**
17 Q. I think I understand what you're saying,
18 Ms. Blozis, is that you would have conversations with
19 Martha Feters about work-related issues and from time
20 to time there would be conversations about Bell and
21 his workload but that wouldn't be what you and she
22 would be discussing in terms of it wouldn't be
23 Mr. Bell all the time; it would be work that you had
24 to complete?

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1 **A. Yes.**
2 Q. That was a convoluted question, but I think you
3 understood what I meant because you had said the
4 predominance wasn't Mr. Bell and it sounded like the
5 predominance of the conversations that you and Martha
6 were having had to do with other work-related issues,
7 not having to do with Mr. Bell.
8 **A. That's correct.**
9 Q. Okay. But focusing on the conversations that
10 you were having about Mr. Bell and the perception that
11 he was being given a lot of work to do in order to
12 force him out, that was conversation, you and Martha
13 were having those conversations from time to time. Is
14 that right?
15 **A. Yes.**
16 Q. Did you ever have any conversations with
17 Gilmore about Mr. Bell receiving unrealistic work
18 assignments?
19 **A. To the best of my memory, no.**
20 Q. Did you ever have any conversations with
21 Mr. Gilmore about Mr. Bell's performance, job
22 performance at any time?
23 **A. It wouldn't have been something Mr. Gilmore and**
24 **I would discuss.**

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1 Q. Do you know what job assignments Mr. Gilmore
2 was giving Mr. Bell?
3 **A. In the Mellon team structure of trust teams,**
4 **Mr. Bell would have been given specific duties as a**
5 **trust administrating officer.**
6 Q. Do you know specifically what Gilmore was
7 giving Mr. Bell to do?
8 **A. Mr. Bell was in the Philadelphia offices, so**
9 **specifically I would not know the exact job**
10 **responsibilities he was getting from Mr. Gilmore.**
11 Q. Do you know, did you ever have any discussions
12 with Mr. Gilmore about the level of work that was
13 being given to Mr. Bell?
14 **A. No.**
15 Q. Did you ever have any discussions with Mr. Bell
16 about the level of work that he was being given by
17 Mr. Gilmore?
18 **A. Specifically at this time I cannot recall exact**
19 **discussions with Mr. Bell.**
20 Q. Now, when you say that you can't recall at this
21 time, are you saying, Ms. Blozis, that you may have
22 had the discussions and you don't remember sitting
23 here today or that you didn't have the discussions?
24 **A. I'm not sure I understand what you mean by the**

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1 **word "discussion."**
2 Q. Conversation, talking.
3 **A. At this time I don't recall specific**
4 **conversations, other than when I may have seen**
5 **Mr. Bell in the Philadelphia offices at team meetings**
6 **and could read indications from him and see by the**
7 **work on his desk how much he was given versus other**
8 **officers.**
9 Q. So it was by when you went to his office or at
10 the meetings in Philadelphia, what, he seemed
11 stressed?
12 **A. Mr. Bell appeared to be stressed but had too**
13 **much panache to complain to coworkers.**
14 Q. And you said you would see on his desk more
15 work than you would see on others' desks.
16 Do you remember when you said when you
17 went to the Philadelphia office and you would see more
18 work on his desk than others' desks?
19 **A. Yes.**
20 Q. Who are you comparing his I guess the height of
21 the documents or the work?
22 **A. I would have seen trust files and work and**
23 **documents on Mr. Bell's desk.**
24 Q. And you were comparing the size of his, the

11 (Pages 38 to 41)

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1 files and documents on his desk as to others?
2 **A. As to others?**
3 Q. When you said you went to Philadelphia and you
4 saw on his desk trust files and other documents, it
5 seemed like you were saying that he had more of it on
6 his desk to do than other people?
7 **A. Yes.**
8 Q. My question was: Who are the other people that
9 seemed to have less on their desk than Mr. Bell?
10 **A. To the best of my recollection, the other trust**
11 **administrating officers at that time.**
12 Q. When was the period of time where you would go
13 and you would make that observation about the amount
14 of work on Mr. Bell's desk?
15 **A. As I remember, for the time period that**
16 **Mr. Bell was assigned to, was sitused in Philadelphia**
17 **as part of the team, of the Gilmore Delaware team.**
18 Q. Did you ever ask Mr. Bell why it was that he
19 had more files and documents on his desk than the
20 other trust officers?
21 **A. I don't recall asking Mr. Bell specifically**
22 **that question.**
23 Q. But words to that effect?
24 **A. Words to the effect?**

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1 Q. That you seem to have more -- when you say you
2 don't recall specifically asking him that question, it
3 may not have been the specific question of "I see you
4 have more trust files and documents on your desk than
5 the other trust officers."
6 It may have been "Oh, I see that you seem,
7 you know, you have more work than the others" or what
8 I was getting at when you said not specifically, it
9 may not have been that specific question but it may
10 have been in the ballpark of that question.
11 **A. In the ballpark of that question.**
12 Q. What would it have been?
13 **A. To the best of my memory, I may have made a**
14 **comment to Mr. Bell about his workload and what was**
15 **apparent to all team members to be his workload.**
16 Q. Did Mr. Bell ever say that he felt that he was
17 given more work because of his age?
18 **A. No.**
19 Q. And Mr. Gilmore was the person that was
20 responsible for giving all the trust officers work, to
21 your knowledge?
22 **A. To my knowledge, as team leader Brendan Gilmore**
23 **assigned the case loads to the individual trust**
24 **officers.**

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1 Q. Before we were talking about others that
2 Mr. Gilmore had put pressure on and Mr. Bell was one
3 and Ms. Squier was another?
4 **A. Is that your question?**
5 Q. Yes.
6 **A. Linda Squier was another.**
7 Q. And why do you say that Mr. Gilmore put
8 pressure on Linda Squier to resign?
9 **A. I was a witness to instances of those times**
10 **when Brendan Gilmore put pressure on Linda Squier.**
11 Q. And what did you witness?
12 **A. I witnessed Brendan Gilmore's unprofessional,**
13 **critical criticisms of how Linda Squier conducted her**
14 **work.**
15 Q. And do you remember when you witnessed this?
16 **A. Specifically not the dates.**
17 Q. Years?
18 **A. To the best of my memory, it would have been**
19 **the last year and a half that Linda Squier was**
20 **employed by Mellon.**
21 Q. I take it you don't remember when she left
22 Mellon?
23 **A. Not the exact date.**
24 Q. Was it sometime in 2000, in the 2000's?

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1 **A. To the best of my memory, it was before then,**
2 **the late 1990's.**
3 Q. Before we talk about Linda Squier, do you
4 remember -- I want to close the loop on Bell.
5 You had said that you also had
6 conversations with Linda Squier about Bell's workload?
7 **A. Yes.**
8 Q. When did you have conversations with her?
9 **A. I don't recall the exact dates.**
10 Q. What was the substance of the conversations?
11 **A. To the best of my recollection, on various**
12 **occasions Linda Squier would share information about**
13 **Robert Bell's workload.**
14 Q. And what would she say about the workload?
15 **A. To the best of my recollection, Linda strongly**
16 **intimated and stated that Mr. Bell was overloaded with**
17 **work.**
18 Q. Do you know if Mr. Bell -- let me back up.
19 Do you know if Mr. Gilmore ever had any
20 criticisms of Mr. Bell's work?
21 **A. To the best of my memory, I don't recall**
22 **specific dates, but I do recall Brendan Gilmore**
23 **criticizing Mr. Bell's history or work as a past**
24 **employee.**

12 (Pages 42 to 45)

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1 Q. And was that while Mr. Bell was employed that
2 you remember this?
3 A. I don't recall that it was when Mr. Bell was
4 still an employee of Mellon.
5 Q. You think it may have been after Mr. Bell left?
6 A. As I remember, it would be after he left.
7 Q. And do you remember what Mr. Gilmore was
8 saying?
9 A. At this time I don't exactly recall the words,
10 but I do recall Mr. Gilmore frequently criticizing
11 past or retired, resigned or fired employees of the
12 team.
13 Q. Do you remember specifically him mentioning
14 Mr. Bell?
15 A. At this time I don't specifically remember a
16 date that he mentioned Mr. Bell.
17 Q. Not a date. But do you remember him saying,
18 mentioning Mr. Bell specifically with respect to
19 criticism of the work?
20 A. To the best of my memory, there would have been
21 a team meeting where Brendan may have mentioned Robert
22 Bell, Linda Squier or Martha Feters and the way they
23 conducted the trust business.
24 Q. Can you be more specific when you said the way

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1 that they conducted the trust business what he said
2 about that?
3 A. Brendan Gilmore would conduct the team meetings
4 in a very brusque, arrogant manner in order to incite
5 the team to work harder and he would use those
6 instances to degrade past performances of employees
7 that were no longer part of the team.
8 Q. So he would mention the past employees by name?
9 A. Not always.
10 Q. Would it be along the lines of criticisms of
11 how past employees had done a particular job? I'm
12 just trying to get a sense of when you said that he
13 would use it as a mechanism to degrade past employees'
14 performances whether he would say this is how a report
15 was done by past employees and that was bad and this
16 is how we're going to do it now. I'm just trying to
17 get a sense of what you meant by that.
18 A. I'm not sure I understand fully the question.
19 Q. Well, when you say he would use the team
20 meetings at times to degrade past employees'
21 performances, can you tell me, give me some specifics
22 by way of examples of what he would do?
23 A. The team meetings weren't always conducted to
24 degrade past employees. Team meetings were held to,

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1 team meetings were held to review the current
2 situations of the files and to impart his feelings of
3 how the team should be working harder or better and
4 not to follow the examples of employees that were
5 released, let go or resigned.
6 Q. And so did you take from that that he
7 considered employees who were no longer there, let go,
8 forced to resign that he considered their work not to
9 be good work and that you should follow somebody
10 else's example of work?
11 A. I would have taken that in that manner.
12 Q. And do you remember him ever saying, you know,
13 don't do what Bell or Squier or Feters did, that was
14 bad work or words to that effect?
15 A. I don't recall him specifically saying don't do
16 Bell's, Squier's or Feters' work, that was bad work.
17 I recall Brendan Gilmore saying the
18 Delaware team was not going to be like it was under
19 Bell, Squier or Feters, to the best of my
20 recollection.
21 Q. Okay. And did he tell you how the Delaware
22 team was going to be?
23 A. Mr. Gilmore would conduct the meetings and tell
24 the team members how he wanted it to be.

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1 Q. What did he say in terms of how -- and I gather
2 how he wanted work to be done when you said how he
3 wanted things to be?
4 A. I'm not sure I fully understand your question.
5 Q. In the team meetings when you say that Mr. Bell
6 would tell everybody how he wanted things to be, would
7 he be talking about how he wanted the PORCH to be run,
8 how he wanted customers to be serviced, things of that
9 nature?
10 A. Yes.
11 Q. We were talking about Linda Squier and I
12 believe you said that you were a witness or you
13 witnessed Gilmore's unprofessional criticisms of her
14 work.
15 Did you ever overhear conversations that
16 Gilmore and Squier were having or did you see it?
17 When you said that you witnessed it, I'm trying to get
18 a sense of how it came about.
19 A. To the best of my recollection, I both heard
20 and saw.
21 Q. What did you see?
22 A. I recollect Brendan Gilmore brusquely
23 criticizing Linda's decisions or her conduct in
24 handling workloads, case files that she, trust files

13 (Pages 46 to 49)